IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION

UNITED STATES OF AMERICA,	
Plaintiff,))
v.)))
SOUTHERN COAL CORPORATION, ET AL.) (ase 110. 7.15-6 v -00554
Defendants.))
)

UNITED STATES' MOTION TO COMPEL COMPLIANCE WITH CONSENT JUDGMENT

The United States moves to compel compliance with the Consent Judgment entered in this matter. ECF No. 45. Defendants have failed to comply with this Court's Consent Judgment by failing to make their February 2023, March 2023, April 2023, and May 2023 installment payments. Therefore, the United States respectfully asks this Court order Defendants to make their required payments under the Consent Judgment immediately.

Respectfully submitted,

CHRISTOPHER R. KAVANAUGH United States Attorney

Date: May 17, 2023 /s/ Laura Day Taylor

Laura Day Taylor Assistant United States Attorney Virginia State Bar No. 94021 Illinois State Bar No. 6289334 Laura.Taylor@usdoj.gov /s/ Krista Consiglio Frith

Assistant United States Attorney Virginia Bar No. 89088 United States Attorney's Office P. O. Box 1709 Roanoke, VA 24008-1709

Telephone: (540) 857-2250 Facsimile: (540) 857-2283 Krista.Frith@usdoj.gov

/s/ Jason S. Grover

Special Assistant United States Attorney Illinois Bar No. 6256032
Counsel for Trial Litigation
Mine Safety and Health Division
Department of Labor
201 12th Street South, Suite 401
Arlington, VA 22202
TEL (202) 693-9326
FAX (202) 693-9392
grover.jason@dol.gov
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed via the Court's CM/ECF system, which will send notice to all counsel of record.

/s/ Krista Consiglio Frith
Krista Consiglio Frith
Assistant United States Attorney